

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ DELTA, LLC,

Plaintiff,

v.

**COMMSCOPE HOLDING COMPANY, INC.,
COMMSCOPE INC., ARRIS
INTERNATIONAL LIMITED, ARRIS
GLOBAL LTD., ARRIS US HOLDINGS, INC.,
ARRIS SOLUTIONS, INC., ARRIS
TECHNOLOGY, INC., and ARRIS
ENTERPRISES, LLC,**

Defendants.

CIV. A. NO. 2:21-CV-310-JRG
(Lead Case)

TQ DELTA, LLC,

Plaintiff,

v.

**NOKIA CORP., NOKIA SOLUTIONS AND
NETWORKS OY, and NOKIA OF AMERICA
CORP.,**

Defendants.

CIV. A. NO. 2:21-CV-309-JRG
(Member Case)

NOKIA OF AMERICA CORP.,

Third-Party Plaintiff,

v.

**BROADCOM CORP., BROADCOM INC., and
AVAGO TECHNOLOGIES
INTERNATIONAL SALES PTE. LTD.,**

*Third-Party
Defendants.*

**DECLARATION OF DARLENA H. SUBASHI, ESQ., IN SUPPORT OF
NOKIA'S OPPOSED MOTION FOR LEAVE TO AMEND ITS INVALIDITY
CONTENTIONS**

I, Darlena H. Subashi, hereby declare under penalty of perjury that:

1. I am an attorney at the law firm of Alston & Bird LLP, counsel for Defendants Nokia of America Corporation, Nokia Solutions and Networks Oy, and Nokia Corporation (“Nokia”). I am a member in good standing of the Bars of Massachusetts, North Carolina, and New York and am admitted to practice before this Court. I am filing this declaration in support of NOKIA’S OPPOSED MOTION FOR LEAVE TO AMEND ITS INVALIDITY CONTENTIONS. Except where otherwise indicated, I have personal knowledge of the facts stated herein and, if called as a witness, I could and would testify thereto.

2. Attached as Exhibit 1 is a true and correct copy of correspondence from Darlena Subashi to Bo Davis dated March 8, 2022. Highlighting has been added for the convenience of the Court.

3. Attached as Exhibit 2 is a true and correct copy of correspondence from Darlena Subashi to Bo Davis dated March 22, 2022. Highlighting has been added for the convenience of the Court.

4. Attached as Exhibit 3 is a true and correct copy of email correspondence between counsel for Nokia and counsel for TQ Delta dated March 23, 2022 – March 31, 2022, regarding TQ Delta v Nokia, 2:21-cv-309-JRG – Nokia’s Amended Invalidity Contentions. Highlighting has been added for the convenience of the Court.

5. Attached as Exhibit 4 is a true and correct copy of excerpts of the redline version of Nokia Defendants’ Amended Invalidity Contentions Cover Pleading (March 23, 2022). Highlighting has been added for the convenience of the Court

6. Attached as Exhibit 5 is a true and correct copy of excerpts of Exhibit F4-008O to Nokia Defendants’ Amended Invalidity Contentions (March 23, 2022). Highlighting has been

FILED UNDER SEAL PURSUANT TO PROTECTIVE ORDER

added for the convenience of the Court

7. Attached as Exhibit 6 is a true and correct copy of excerpts of Exhibit F4-008P to Nokia Defendants' Amended Invalidity Contentions (March 23, 2022). Highlighting has been added for the convenience of the Court.

I declare under penalty of perjury that the foregoing is true and correct.

Date: April 1, 2022

/s/ Darlena H. Subashi
Darlena H. Subashi